

UNITED STATES DISTRICT COURT

for the
Southern District of Texas
McAllen Division

United States of America

v.

1- Sergio Eduardo PEREZ-Barragan (YOB 1962,
Mexico))
2- Faustino VELAZQUEZ-Crisostomo (YOB 1972,
Mexico))
3- Carlos CASANOVA-Ledezma (YOB 1965, Mexico))

Case No. 7:18mj 2560

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of December 14, 2018 in the county of Hidalgo in the Southern District of
Texas, the defendant violated 18 U. S. C. § 554(a)
an offense described as follows:

It shall be unlawful for any person to fraudulently or knowingly export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receive, conceal, buy, sell, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: One thousand (1,000) rounds UMC 9mm ammunition, three hundred fifty (350) rounds Blazer Brass .380 caliber ammunition, two hundred (200) rounds Federal .243 caliber ammunition, and twenty (20) rounds Winchester .270 caliber ammunition.

This criminal complaint is based on these facts:

See Attachment A.

☒ Continued on the attached sheet

/S/ Michael Venegas

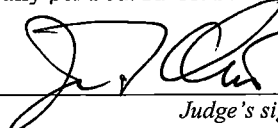
Complainant's signature

Michael Venegas, HSI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Submitted by reliable electronic means, sworn to and attested to electronically per Fed. R. Cr. P. 4.1, and probable cause found on

Date: December 15, 2018 - 9:24 a.m.City and state: McAllen, Texas


Judge's signature

Juan F. Alanis, U.S. Magistrate Judge

Attachment A

The facts establishing the foregoing issuance of a criminal complaint are based on the following:

I, Homeland Security Investigations (HSI) Task Force Officer (TFO) Michael Venegas, Affiant, do hereby depose and state the following:

On December 14, 2018, United States Customs and Border Protection Officers (CBPOs) were working the outbound travel lane at the Hidalgo International Bridge Port of Entry (POE) in Hidalgo, Texas when CBPOs observed a silver Honda Ridgeline and a blue Ford F-250 truck enter the outbound travel lanes.

A CBPO identified the driver of the Ford F-250 as Faustino VELAZQUEZ-Crisostomo and the driver of the Honda Ridgeline as Sergio Eduardo PEREZ-Barragan. An additional passenger in the Honda Ridgeline was identified as Carlos CASANOVA-Ledezma. A CBPO took a negative declaration from VELAZQUEZ, PEREZ, and CASANOVA for being in possession of any ammunitions and referred the Honda Ridgeline and Ford F-250 for a secondary inspection. During the secondary inspection packages were discovered in the Ford F-250 containing one thousand (1,000) rounds of UMC 9mm ammunition, three hundred fifty (350) rounds of Blazer Brass .380 caliber ammunition, two hundred (200) rounds of Federal .243 caliber ammunition, and twenty (20) rounds of Winchester .270 caliber ammunition.

HSI Special Agents (SAs) and HSI TFOs arrived at the Hidalgo International Bridge POE and conducted interviews of VELAZQUEZ, PEREZ, and CASANOVA. VELAZQUEZ stated the ammunition found in the Ford F-250 was given to VELAZQUEZ by CASANOVA at a Wal-Mart parking lot in Hidalgo County. VELAZQUEZ further stated VELAZQUEZ was to be paid in ammunition by CASANOVA once VELAZQUEZ successfully smuggled the ammunition into Mexico from the United States.

CASANOVA stated the ammunition found in the Ford F-250 was purchased by PEREZ on December 14, 2018 in Cameron and Hidalgo Counties, Texas. CASANOVA further stated CASANOVA and PEREZ did not want to export the ammunition purchased by PEREZ into Mexico from the United States because neither had a license to export ammunition and both knew it was a violation of United States Law to do so without a license. CASANOVA stated CASANOVA and PEREZ went to a Wal-Mart in Hidalgo County, Texas and transferred the one thousand (1,000) rounds of UMC 9mm ammunition, three hundred fifty (350) rounds of Blazer Brass .380 caliber ammunition, two hundred (200) rounds of Federal .243 caliber ammunition, and twenty (20) rounds of Winchester .270 caliber ammunition to VELAZQUEZ who was to smuggle the

Attachment A

ammunition via the Hidalgo International Bridge POE to Mexico. CASANOVA stated once in Mexico, CASANOVA and PEREZ were to meet with VELAZQUEZ to retrieve the ammunition from VELAZQUEZ's Ford F-250.

VELAZQUEZ and CASANOVA admitted to knowing that smuggling ammunition from the United States was contrary to United States Law. Ammunition cannot be exported outside of the United States without a license in accordance with Title 22, United States Code Section 2778 and Title 22 of the Code of Federal Regulations. VELAZQUEZ, PEREZ, and CASANOVA do not have a license to export ammunition.

/S/ Michael Venegas

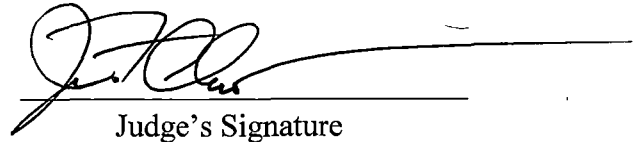
Complainant's Signature

Michael Venegas, HSI TFO
Printed Name and Title

Sworn to before me and signed in my presence.

Submitted by reliable electronic means, sworn to and attested to electronically per Fed. R. Cr. P. 4.1, and probable cause found on

Date: December 15, 2018 *CG:27a.t.*



Judge's Signature

City and state: McAllen, TX

Juan F. Alanis, Magistrate Judge
Printed Name and Title